

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA)

v.)

CARL SARA,)

Defendant.)

CASE NO. 1:17-MJ-66

FEB 13 2017

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Peter Kaupp, being first duly sworn, hereby depose and state as follows:

INTRODUCTION & BACKGROUND

1. I am a Special Agent ("SA") with the Federal Bureau of Investigation ("FBI"), duly appointed according to law and acting as such. I have been so employed by the FBI since March of 2005. I am currently assigned to the Washington Field Office, where I am responsible for conducting and assisting in investigations involving child pornography and the sexual exploitation of children. I have gained experience through training and work related to conducting these types of investigations. During my career, I have participated in investigations involving violent gang members, narcotics traffickers, human trafficking organizations, and white collar crimes to include public corruption and financial crimes. I have also participated in Title III wiretap investigations involving public corruption, drug trafficking, and gang matters. During my career as an FBI agent, I have (a) conducted physical and wire surveillance; (b) led and participated in the execution of search warrants and arrest warrants for various crimes; (c) reviewed and analyzed numerous

recorded conversations and other documentation of criminal activity; (d) debriefed cooperating defendants and confidential human sources; (e) monitored wiretapped conversations; and (f) conducted physical surveillance of individuals engaged in various crimes.

2. I have received training in the area of child pornography and child exploitation, and have had the opportunity to observe and review numerous examples of child pornography (as defined in 18 U.S.C. § 2256) in all forms of media including computer media. Moreover, I am a federal law enforcement officer who is engaged in enforcing the criminal laws, including 18 U.S.C. §§ 2251 and 2252, and I am authorized by the Attorney General of the United States to obtain and execute warrants.

3. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

4. Based on my training and experience, and publicly-available information, I know that the National Center For Missing and Exploited Children ("NCMEC") is a nonprofit, nongovernmental organization in Alexandria, Virginia, that works with law enforcement on issues related to missing and sexually exploited children. One of the services provided and administered by NCMEC is its CyberTipline, which serves as the national clearinghouse for leads regarding sexual exploitation crimes against children.

5. In addition to reports from the general public, reports are made by U.S. electronic communication services ("ECS") and remote computing services ("RCS"), which are required

under 18 U.S.C. § 2258A to report “apparent child pornography” to NCMEC via the CyberTipline if they become aware of the content on their servers. Leads are reviewed by specially-trained analysts, who examine and evaluate the reported content, add related information that may be useful to law enforcement, use publicly-available search tools to determine the geographic location of the apparent criminal act, and ultimately provide all of the gathered information to the appropriate law enforcement agency for review and possible investigation.

6. The CyberTipline receives reports, known as CyberTip reports, on the following types of criminal conduct: possession, distribution, receipt, and production of child pornography; online enticement of children for sexual acts; child prostitution; sex tourism involving children; child sexual molestation; and unsolicited obscene material sent to children, among other things.

7. CyberTip reports vary in detail depending on the nature of the report and which entity submits them. The reports can include information: (1) relating to the identity of any individual who appears to have violated federal law by committing or attempting to commit the criminal conduct described above; (2) historical information on when or how a customer or subscriber of an ECS or RCS uploaded, transmitted, or received apparent child pornography; (3) geographical information on the involved individual or website, which may include the Internet Protocol (“IP”) Address or verified billing address or geographic identifying information, including area code or zip code; (4) any images of apparent child pornography; and (5) the complete communication containing any image of apparent child pornography. See 18 U.S.C. § 2258A(b). Also, as will be illustrated below, CyberTip reports can be supplemented and made in connection with other CyberTip reports.

PROBABLE CAUSE

8. On or about September 19, 2014, Xoom.com, an online international money transfer service, notified Yahoo! that a number of Yahoo! accounts were engaged in the sale of child exploitation material, and Xoom.com cited CyberTip reports it had filed with NCMEC on individuals/accounts it believed had used its services to receive funds for child exploitation material.

9. The Xoom.com CyberTip reports came to the attention of the Yahoo! Electronic Crimes Investigative Team (the "ECIT"). The ECIT focuses on identifying and documenting instances in which Yahoo!'s services are used in a manner that is in violation of Yahoo!'s Terms of Service. Yahoo!'s Terms of Service include a prohibition on using Yahoo!'s services to engage in criminal activity.

10. On or about October 4, 2014, and on or about December 5, 2014, the ECIT provided supplemental reports to NCMEC outlining the results of the ECIT investigation that commenced following notice of the CyberTip reports submitted by Xoom.com. Yahoo! reported the following, among other things: (a): the ECIT conducted an investigation and observed that several Yahoo! Electronic accounts (hereinafter referred to as "Seller Accounts"), operating from the Phillipines, appeared to be selling images, video, and live streaming video of child sexual abuse via Yahoo! Mail and Yahoo! Messenger; and (b) it appeared, based on Yahoo!'s investigation, that many or most of the Seller Accounts contained what Yahoo! Described as "child abuse imagery."

11. Based in part on the above, federal search warrants authorizing the search of several Seller Accounts were obtained and executed on Yahoo! in or about February 2015. Soon thereafter, Yahoo! returned records pursuant to these federal search warrants. These search warrants remain under seal. One Yahoo! account identified in the course of this investigation as interacting with the Seller Accounts was “carl_in_dc@yahoo.com” (hereafter “carl_in_dc” or “carl_in_dc user”).

12. In or about early February 2015, an administrative subpoena issued to Yahoo! returned the following subscriber information for the “carl_in_dc” account: Name, Carl Sara; at a particular address on Riggs Place in northwest Washington, D.C. The return identified his phone number as 571-334-[5555]¹.

13. In or about early February 2015, a second administrative subpoena issued to Yahoo! returned the following subscriber information for the “carl_in_dc” account: Name, Mr Carl Sara, alternate email address, “carl.sara@cmsteamworkassociates.com,” and telephone number, 571-334-[5555].

14. Examination of IP logs provided by Yahoo! in February 2015 yielded multiple Verizon IP addresses used to access the Yahoo! “carl_in_dc” account between November 1, 2015, and January 4, 2016. All provided IP addresses were queried through an open source IP address search tool. The “carl_in_dc” account was connected to the internet primarily via a Verizon FIOS IP address (74.96.197.176) and also via Verizon Wireless NATTING IP addresses².

¹ Some personal identifiers, like phone numbers and addresses, have been disguised in this affidavit in order to protect the privacy of third parties. These redactions are signified by brackets.

² A Verizon Wireless NATTING IP address is an IP address associated with multiple phone numbers.

15. Administrative subpoenas issued to Verizon for Verizon FIOS IP address 74.96.197.176 returned the following registered subscriber: Carl Sara, at a physical service address on Caneel Court in Springfield, Virginia, which is in the Eastern District of Virginia, and the same telephone number identified above, 571-334-[5555], and email address “carl_in_dc@yahoo.com”.

16. An administrative subpoena issued to Verizon Wireless for NATTING IP addresses 70.208.139.133 (on October 12, 2015), 70.192.201.3 (on November 2, 2015), and 70.192.211.237 (on November 17, 2015), all revealed the same phone number accessing the Yahoo! “carl_in_dc” account.³ This unique phone number, 571-334-[5555], was registered to Carl Sara at the same physical address on Caneel Court in Springfield, Virginia, which is in the Eastern District of Virginia, and is the same phone number discussed above.

17. On or about August 14, 2015, in connection with the ongoing investigation of the Seller Accounts, financial wire transaction records obtained from Western Union revealed several wire transfers in 2013 from one Carl Sara to individuals in the Philippines, including the Seller Accounts. Western Union also provided the following information associated with the Carl Sara account: Address: the same particular address on Riggs Place in northwest Washington, D.C., the same telephone number, “(571) 334-[5555],” discussed above; and the email address: “carl_in_dc@yahoo.com”.

³ NATTING IP addresses allow for upwards of several hundred telephone numbers to be actively using the same IP at any given time. In order to identify a single telephone number associated with activity on the IP, multiple IP addresses at varied dates/times must be provided to Verizon. Verizon responds back with lists of telephone numbers associated with each IP address/date/time combination. These lists are cross referenced to identify the single telephone number appearing all three times.

18. On or about January 22, 2016, pursuant to an authorized search warrant signed by Magistrate Judge Theresa C. Buchanan of the United States District Court for the Eastern District of Virginia, a search and seizure warrant was executed via fax at Yahoo Inc. for the full Yahoo! account of "carl_in_dc@yahoo.com". The return resulting from this search warrant included images of child pornography.

19. On or about January 28, 2016, pursuant to a search warrant signed by Magistrate Judge Theresa C. Buchanan, FBI agents executed a search and seizure at the same particular physical address on Caneel Court in Springfield, Virginia, discussed above, which is in the Eastern District of Virginia. Carl Sara was at home at the time of the search. Numerous items of evidentiary value, including a number of computer devices, were seized during the execution of the warrant. Several of these devices were found to contain images and videos of child pornography. Agents also seized Carl Sara's passport, passport number [5555], pursuant to the search warrant. Stamps in Carl Sara's passport indicate that he entered the Philippines on August 1, 2013, and exited on August 14, 2013.

20. Your affiant requested permission to speak with Carl Sara during the execution of the residential search warrant, and he agreed to be interviewed. He stated that he had moved from the District of Columbia to the Eastern District of Virginia in September 2014. He stated that he was born in 1954. He admitted that his home Wi-Fi network was password protected. He admitted that "carl_in_dc@yahoo.com" is his personal email address. He admitted to chatting with people in the Philippines and to discussing sex with these women and their children. He admitted to sending money to people in the Philippines. He also admitted to paying money for and viewing

child pornography sent from people in the Philippines. Forensic analysis of the computer devices seized from the home confirmed the existence of child pornography and communications relating to the attempted coercion and enticement and sexual abuse of children.

21. I have reviewed records returned in response to search warrants sent to Yahoo! related to the account "carl_in_dc@yahoo.com". I also reviewed documents and other files obtained from computer media items seized from the target's home pursuant to the residential search warrant executed in January 2016. The following factual summation is based on my review of the totality of the evidence obtained in the investigation to date, but it does not include every fact relevant to the investigation.

Evidence Related to Travel to the Philippines, "Luz Madolaria," Suspected Minors "Khyzza," "Danica," & "KC", & Child Pornography⁴

22. I reviewed Yahoo! Messenger chat conversations that took place on or about May 30, 2013, between one "lmadolaria" and the "carl_in_dc" account. In these chats, the "carl_in_dc" user appears to discuss having sex with an adult female, and several minor females she knows or is related to, during an upcoming July/August 2013 trip to the Philippines. Excerpts of the chats follow:

- Initially, the user of "carl_in_dc" states, "I plan to be with you on July 28 and you, Khyzza, and Danica on the 29th." The user then writes, "Last time [I first]⁵ I fucked you then Khyzza. I will spend a full day with you first, then a full day with you Khyzza and Danica.

⁴ "Luz" is sometimes spelled "Lhuz" within these communications, but it is your affiant's belief and understanding that these refer to the same person. Similarly, "KC" is sometimes referred to as "Kim Catherine".

⁵ Unless otherwise noted in brackets, all spelling and grammar errors are presented as they appear in the original communications.

On the second day I want to fuck all three of you girls on the same day.” The “carl_in_dc” user then asks, “Are you ready to let me have KC’s cherry honey?”

- The “Imadolaria” user responds, “well yeah i know ur gentle enough for her.”
- The “carl_in_dc” user responds, “Thank you honey, I will be very gentle with her and you can watch I will only fuck her if her vagina gets big enough for me, otherwise I will just lick her pussy and asshole and cum in her mouth honey. You are a very good mom Luz.”
- The “carl_in_dc” user then writes, “Honey I will use baby oil when I finger her and so that my cock slides easily into her and I will not push too hard she will have no blood or pain and she will love it I am sure. . . . I will fuck her gently and lick her little breasts. You can watch me cum inside your daughter Luz.”
- Later, the “carl_in_dc” user writes “Khyzza is good at spreading her legs This time no covers so you can watch me fuck her I may fuck her doggie style this time from behind Luz it is so exciting to fuck young girls, I am so glad we met.”
- The “Imadolaria” user then responds, “thank u hun anythign for u hun as long as it makes u happy I know ur always there also for me.”
- The “carl_in_dc” user then responds, “Yes honey. I will send you some money as a partial advance payment for the time with KC honey and your permission to let me fuck her I will send you \$200 US and then pay you an addition \$300 US after I fuck her Yes I will send you \$200 today I am hard thinking of fucking KC.” Later that same day, the “carl_in_dc” user writes, “Luz honey are you there?”
- The “Imadolaria” user responds, “yes hun”.
- The “carl_in_dc” user then writes, “I sent you \$200 through WU. The Tracking Number (MTCN) is 7514561334”.
- Later that same day, the “carl_in_dc” user wrote, “Did you talk with KC about sex?”
- The “Imadolaria” user responds, “yes little by little darling.”
- The “carl_in_dc” user then writes, “she knows about man’s cock and girl’s vagina?”
- The “Imadolaria” user responds, “she knew a little”.

23. On or about that same day, roughly contemporaneous with the above chats, the “carl_in_dc” user received a confirmation email from Western Union. That email read, in part, “Dear CARL SARA, Thank you for using the Western Union Money Transfer service.” The email also read, “Your Money Transfer Control Number [MTCN] is : 7514561334 Date of Order: 05/30/2013 Amount Sent \$200 Local currency pay out = 8262.49 PHP.” The “Sender” is then identified to be “CARL SARA,” with an address of “[5555] RIGGS PLACE, NW,” “WASHINGTON, DC 20009” and an email address of “CARL_IN_DC@YAHOO.COM”.

24. The investigation revealed files relating to travel to the Philippines via the Eastern District of Virginia on a computer device seized from the target’s home. These files were found in a user-created folder named “2013 Travel.” A PDF file titled “Travel Reservation July 31 for SARA.pdf” lists two alternate travel itineraries to Manila International Airport for “SARA/CARL” departing on July 31, 2013, and returning on August 15, 2013. One of the itineraries was scheduled to depart from Dulles International Airport.

25. A Microsoft Excel spreadsheet named “2013 Philippine Itinerary (version 1).xls” was located in the same user-created “2013 Travel” folder on a computer device seized from the target’s home in the Eastern District of Virginia. According to the properties of the Excel file, the author of the document is listed as “Carl”. The last revised date for the document is July 26, 2013. The spreadsheet lists dates in late July and early August 2013 next to a series of female names. Other columns appear to include cities and hotels. One section of the spreadsheet appears as follows:

Saturday	8/10/2013	Jane, Marilou, and Cathy	Mandarin Oriental
Sunday	8/11/2013	Luz	Kalipayan Resort
Monday	8/12/2013	Luz, Khyzza, Danica	Kalipayan Resort
Tuesday	8/13/2013	Luz and KC	Kalipayan Resort
Wednesday	8/14/2013		To airport

26. On the same seized computer device as the Excel spreadsheet were several versions of a Microsoft Word document with variations of the title “Card” or “Card Recovered” followed by what appears to be a date (e.g., “Card 3-28-14.doc”). The file appears to be a user-created compendium of information the user wants to memorialize, including credit card data, links to websites, lists of user names, sections of chats or emails, or details about chat participants. One section in particular appears in several versions of the file:

Luz Honey, your number is 63 927 333 [5555], right?
 Daughter Kim Catherine [month, date,] 2012 [her] daughter turn[s] 7
 LUZ MADOLARIA birthday [month, date,] 1974
 [address]

I keep remembering how nice it was to fuck you. I love how tight your pussy is. I love a woman with a really tight pussy like yours. Sometimes if it is hard to get in, I like to force myself in and pretend like I am taking you against your will!

Luz likes this resort:
 Kalipayan Resort & Hotel:
 [address and phone number of resort]

27. On or about the evening of July 26 and into the morning of July 27, 2013, the “carl_in_dc” user chatted with the “lmadolaria” user. Excerpts of those chats follow:

- The “carl_in_dc” user writes, “Hi Luz! I booked the Kalipayan Resort for August 11-14, hope those dates are okay for you honey”.
- The “lmadolaria” user responds, “so ur sure this aug 11 to 14”?
- The “carl_in_dc” user responds, “Yes baby I reserved the Kalipani Resort I wanted to stay longer this time but need to be back here to rebuild my company”.

- The “Imadolaria” user responds, “that’s ok”.
- The “carl_in_dc” user then writes, “Maybe 11th with you, 12th with you and Khyzza and Danica if she wants to join and 13th you and KC?”
- The “Imadolaria” user responds, “they want to join hun”.

28. On October 20, 2016, your affiant obtained records from Korean Air for travel records for Carl Sara. Korean Air responded with records indicating that “Carl Sara,” passport number [5555], took a flight from Dulles, Virginia (IAD), through Seoul, Korea (ICN), to Manila, Philippines (MNL), on July 31, 2013. Korean Air’s records also indicate Carl Sara returned from the Philippines to the United States on August 14, 2013, through Seoul, Korea (ICN), to New York, New York (JFK). Dulles airport is located in the Eastern District of Virginia.

29. Records obtained for a Bank of America credit card account associated with the target indicate the following charges relevant to the investigation:

- On July 22, 2013, the target incurred a \$2,370.30 charge for a roundtrip tickets for passenger “SARA/CARL” for a flight scheduled for July 31, 2013, from IAD (Dulles International Airport, Virginia) to ICN (Incheon International Airport in Seoul, South Korea).

30. Records obtained for a JP Morgan Chase credit card account associated with the target indicate the following charges relevant to the investigation:

- On August 11, 2013, the target incurred a charge of \$1,101.59 from the “MANDARIN ORIENTAL HOTEL” in “MAKATI CITY⁶ PH.”
- On August 13, 2013, target incurred a charge of \$115 from Korean Air.

⁶ “Makati City” is understood to be a reference to a city in the Philippines near the Manila region.

31. On or about August 14, 2013, the “carl_in_dc” user sent an email to “lmadolaria@yahoo.com”. The email reads, in part, “Hi Luz, Thank you for your patience with me and your understanding. I spent half a day in the Manila Airport (not my most pleasant experience), but I was able to get routed to Seoul a day earlier and in five hours I will be on a flight to New York. I should be at home by 7:00 PM on the 14th.” The email also reads, “My home has a one bedroom apartment in the basement that I rent to help pay the mortgage. It is a nice place with an entrance through a garden. My tenant killed himself by cutting his wrists. It must have happened the day I left. . . . Sorry I had to leave when I did, but it was the right thing to do. . . . Love, Carl”.

32. On or about August 14, 2013, the “carl_in_dc” user received an email from “Lhuz Madolaria <lmadolaria@yahoo.com>”. The “lmadolaria@yahoo.com” user wrote, “Carl Darling, I do understand about it don’t worry about me. . . . I saw u[] shaking hun that time before u left. . . . Im so sorry also cause my kids are kinda noisy. . . . Love, Luz.”

33. On or about October 3, 2013, after the target had returned to the United States from the Philippines in mid-August 2013, the “carl_in_dc” user was chatting with one “isaac14catz”. The “carl_in_dc” user wrote, “Hey after I was with you I met some nice girls in Dasmarinas⁷ and had a great time Luz, Khyzza, Danica, and KC Luz is 38, Khyzza is 14, Danica is 15 and KC is 8.” The “carl_in_dc” user then wrote “yeah, Luz and Khyzza I had fucked before, but Danica and KC [were] new”. The “carl_in_dc” user continued, “I slept with Khyzza and Danica together

⁷ “Dasmarinas” is understood to be a reference to the city of Dasmarinas in the Cavite province of the Philippines near Manila.

and fucked them both KC is Luz' daughter, but she has begun masturbating, so Luz let me fuck her".

34. On or about October 28, 2013, the "carl_in_dc" user chatted with the "lmadolaria" user. Excerpts of those chats follow:

- The "carl_in_dc" user writes, "How are Khyzza, Danica, and your lovely daughter KC honey?"
- The "lmadolaria" user responds, "they r ok [KC] is sleeping already its 3:01am here now".
- The "carl_in_dc" user writes, "Honey Khyzza was much better in bed this time than the last time I fucked her".
- The "lmadolaria" user responds, "u know what hun danica told me that ur cock is real big".
- The "carl_in_dc" user writes, "I so enjoyed fucking Danica honey because she gets so wet . . . Yeah and Khyzza sucked my cock this time and she is very good at it".

35. On or about November 3, 2013, the "carl_in_dc" user chatted with the "lmadolaria" user. Excerpts of those chats follow:

- The "carl_in_dc" user writes, "Honey you know this time when I fucked Khyzza she really pushed into me and seemed to really enjoy herself more than a year ago Yeah she sucked my cock too, next time I'll cum in her mouth Danica is really great in bed honey, she loves to fuck and she gets really wet Yeah she is not as tight as Khyzza, but her cunt feels so good, I really [love] her . . . I am disappointed I needed to leave 2 days early because I really was looking forward to spending time with KC . . . I am really the most excited about her Of all the girls I know, I love her most Was it your plan to stay with KC and me or was it your plan to make it just her and me? I am happy with either arrangement".
- The "lmadolaria" user responds, "well plan to stay [KC] with me and u".
- The "carl_in_dc" user writes, "You know I am very gentle, but I am sure I could get my full length inside her by the second day Especially since her hymen is already broken Almost every day I masturbate to KC's pictures Can you send me some fashion

pictures of her, or some naked pics, or pictures of her masturbating? . . . I would like to see her in tall heels, a micro skirt, and see thru top, with her hair done and makeup”.

Miscellaneous Communications Related to Sex with Minors & Child Pornography

36. In or around the time during which the “carl_in_dc” user was planning the July/August 2013 trip to the Philippines to be with “Luz,” “Danica,” “Khyzza,” and “KC,” discussed above, that user was also conducting additional miscellaneous chats and emails relating to sex with minors and child pornography. Many such emails were found on the computer devices seized from Carl Sara’s home in the Eastern District of Virginia. Excerpts of the communications are discussed below.

37. I reviewed Yahoo! Messenger chat conversations that took place on or about May 23, 2013, between one “vicky-elacion” and the “carl_in_dc” account. (This is prior to the target’s trip to the Philippines through Dulles in late July/early August 2013.) Excerpts of these chats follow:

- Initially, the user of “carl_in_dc” asks, “Please tell me about your kids, I love children.”
- The “vicky-elacion” user replies, “yes hun she age 6.” The “vicky-elacion” user tells the SUBJECT account user that her six-year-old’s name is “[A]na.”
- The “carl_in_dc” user writes “I would love to meet Ana honey,” and “I would love to kiss her” and “lick her pussy too if it is ok with you.”
- The “carl_in_dc” user then asks, “Has Ana sucked any of your boyfriends yet?” and states, “We can teach her.”
- Later the “carl_in_dc” user writes, “I would love to fuck her, but her pussy may be too small to fit me. I am happy to lick her pussy and wait a few years until her pussy is large enough to fuck.”
- The “carl_in_dc” user later writes, “She will be the right size to fuck when is 10, 11, or 12,” and “I love when a mom shares her daughter with me.”

- Later, the “carl_in_dc” user writes, “Yeah I am sure her hymen is intact. I usualyy like a girl and you baby oil with my fingers to open her up. I use my fingers to rip her hymen gently, not cock”.
- Later, the “carl_in_dc” user writes, “I will meet you and Ana in July in Makati. The 3 of us can stay together for a few days” and “I have a lot of experience with young girls and I am very gentle.”
- The “carl_in_dc” user then writes, “If she is not big enough, we will wait, but I did fuck a 6 year old once before.” The user then wrote, “yeah her name is Kim Catherine and I came inside her,” and “She is age 10 now and I still see her. She lives with her mom in Dasmarinas.”
- The “carl_in_dc” user then asks, “would you like to watch me fuck Kim Catherine?” and “In J[u]ly too, you can kiss her if you like.”
- The “carl_in_dc” user later asks, “Do you have any pictures of you and Ana you can share with me?” The “carl_in_dc” user then wrote, “I want to masturbate looking at Ana.”
- The “carl_in_dc” user later wrote, “Honey I think I will try to fuck Ana in July even if she is a little too small, but I will be gentle. I won’t force myself into her.”
- Later that same day the “carl_in_dc” user writes, “Well honey I think it is very nice that you offered to let me fuck Ana.” Shortly thereafter, the “carl_in_dc” user asks what the “vicky-elacion” user’s real name is.
- The “vicky-elacion” user responds that her first name is “GEMMA”.
- The “carl_in_dc” user writes, “Gemma, I sent you \$50 through Western Union. Tracking Number (MTCN) is 3369185368. My name is Carl Sara and I live in USA. . . . You will need that tracking number and my name to get the money.”
- Later, the “carl_in_dc” user writes, “I have fucked Kim Catherine in Dasmarinas for more than 4 years, maybe more than 100 times She is 10 and she masturbates every day now, she goes on YM and shows me sometimes, she is a juicy little girl She fucked her younger brother! The mom [g]ot a little[e] mad at that yeah KC sucked and fucked her brother well now that she knows how to fuck, she wants to use it the brother is 12, older, but he was still a virgin, KC taught him how to fuck.”
- A short time later, the “carl_in_dc” user writes, “Well Gemma, I must go to a meeting,” and their correspondence ended.

38. That same day, roughly contemporaneous with the above chats, the “carl_in_dc” user received a confirmation email from Western Union. That email read, in part, “Dear CARL SARA, Thank you for using the Western Union Money Transfer service.” The email also read, “Your Money Transfer Control Number [MTCN] is : 3369185368 Date of Order: 05/23/2013 Amount Sent \$50 Local currency pay out = 2037.66 PHP.” The “Sender” is then identified to be “CARL SARA,” with an address of “[5555] RIGGS PLACE, NW,” “WASHINGTON, DC 20009” and an email address of “CARL_IN_DC@YAHOO.COM”.

39. I reviewed Yahoo! Messenger chat conversations that took place on or about June 10, 2013, between one “mendozachristine023@yahoo.com” and the “carl_in_dc” account. Excerpts of these chats follow:

- The user of “carl_in_dc” asks, “Are you Christine? I like your girls a lot honey,” and “I am Carl, age 58, from usa.”
- “Mendozachristine023@yahoo.com” replies, “im juvy 16 philippines.”
- The user of “carl_in_dc” responds, “Hi Juvy! NTMU!⁸ Where in Philippines do you live honey?”
- “Mendozachristine023@yahoo.com” responds, “taguig”⁹.
- “carl_in_dc” then writes, “Oh nice! I will be there in a month” ... “We can meet if you like honey!” ... “Where is your mom honey?” and “What is your mom’s name Juvy?”
- “Mendozachristine023@yahoo.com” responds, “Ruby,” and writes, “hope you can pay for a show”.

⁸ Believed to be shorthand for “nice to meet you.”

⁹ “[T]aguig” is believed to be a reference to Taguig City, which is a city located southeast of Manila in the Philippines.

- “carl_in_dc” writes, “Yes I can honey, should I send the [money] to your mom Ruby?”
- “Mendozachristine023@yahoo.com” responds, “to me offcourse :)”
- “carl_in_dc” writes, “Ok I send through Western Union ok”
- Mendozachristine023@yahoo.com responds, “im the one will do show”.
- “carl_in_dc” writes, “ok”.

40. That same day, roughly contemporaneous with the above chats, the “carl_in_dc” user received a confirmation email from Western Union. That email read, in part, “Dear CARL SARA, Thank you for using the Western Union Money Transfer service.” The email also read, “Your Money Transfer Control Number [MTCN] is : 8769537074 Date of Order: 06/10/2013 Amount Sent \$35 Local currency pay out = 1465.43 PHP.” The “Sender” is then identified to be “CARL SARA,” with an address of “[5555] RIGGS PLACE, NW,” “WASHINGTON, DC 20009” and an email address of “CARL_IN_DC@YAHOO.COM”.

41. I also reviewed Yahoo! Messenger chat conversations and emails exchanged on or about June 17, 2013, between one “marygracecapco10@yahoo.com” (“marygracecapco10”) and the “carl_in_dc” discussing the receipt of child pornography. Excerpts of those conversations and emails follow:

- First, the “marygracecapco10” user asks, “u want siter¹⁰ show here hun”?
- The “carl_in_dc” user replies, “Yes, honey, the younger, the better! What ages honey?”
- The “marygracecapco10” user replies, “8 and 13 hun so u [l]ike . . . them for a show hun”?

¹⁰ This “siter” reference may refer to a babysitter.

- The “carl_in_dc” user replies, “yeah i like, I would love [to] meet the year 8 I will be there in 3 weeks”. The “carl_in_dc” user then wrote, “I am here honey, can you send pics now? . . . Are you sending the pics now honey?”
- The “marygracecapco10” user then writes, “I can send u my yo[u]ng videos here an also young pics here hun,” to which the “carl_in_dc” user replies, “ok send honey, like you said you would.”

42. Roughly contemporaneous with these chats, the “carl_in_dc” user received an email titled “Fw:videos” which contained a video titled “kinder kids porno”. The video depicts a young girl fellating an adult male. After this email was received, the “marygracecapco10” user asks, via chat, “u see hun”? The “carl_in_dc” user replies, “yes honey thank you”.

43. The “carl_in_dc” user then received an email titled “FW: : janna naked pics” which contained several photographs of minor girls exposing their genitals.

44. The “carl_in_dc” user then received an email titled “Fw: 13yrolld fuck” which contained a video depicting a minor girl having sex with an adult male. After this email was received, the “carl_in_dc” user wrote to the “marygracecapco10” user, “thankyou honey”.

45. The “carl_in_dc” user then received an email titled “Fw: sister pics,” which contained several photographs of minor girls exposing their genitals.

46. I reviewed a second set of Yahoo! Messenger chat conversations, dated June 20, 2013, between a Yahoo! chat user named “bonason92” and “carl_in_dc”, which appear to discuss the sale of photos and videos of young girls and also to discuss a potential in-person meeting during the “carl_in_dc” user’s upcoming 2013 trip to the Philippines. Specifically, in this chat conversation, the “carl_in_dc” user responds enthusiastically to the offer by “bonason92” to sell a video of a 3-year-old “suck[ing],” stating, “I love young girls honey, the younger the better!” The two discuss payment methods, and the user of the “carl_in_dc” states that he needs to see a sample

before sending money. The user of the "carl_in_dc" then received three emails all sent from one "jenny.helo@yahoo.com".

47. The first, which is titled "Fw: : VIDEOS_____3EXAMPLE", contained three videos. Two videos depicted sex between minors females and adult males and the third depicted a minor female masturbating.

48. The second, which is titled, "Fw: joyce", contains numerous photographs that appear to depict prepubescent and minor girls exposing their genitals.

49. The third, which is titled "Fw: joyce", appears to contain the same material as the preceding email.

50. After receiving all three email attachments, the "carl_in_dc" user responds via chat, saying, "nice pics and video honey". "Bonason92" then requests payment, and the user of the "carl_in_dc" states that he sent \$50 via Western Union, and provides a tracking number ("3549421987"). "Bonason92" requests his name, to which he replies, "Carl Sara." She says her name is "Ruby Cruz." The "carl_in_dc" user then tells her, "I will be in Philippines in 2 weeks, would you like to meet?" She says yes. The "carl_in_dc" user asks, "What ages are your girls . . . I would like to meet you when I am there in 2 weeks." The "carl_in_dc" user again asks "what ages are your girls?" She says the youngest is three years old. The Western Union records indicate a \$50.00 wire transfer from "Carl Sara" to "Ruby Cruz" on June 20, 2013, with the tracking number 3549421987.

51. That same day, roughly contemporaneous with the above chats, the “carl_in_dc” user received a confirmation email from Western Union. That email read, in part, “Dear CARL SARA, Thank you for using the Western Union Money Transfer service.” The email also read, “Your Money Transfer Control Number [MTCN] is : 3549421987 Date of Order: 06/20/2013 Amount Sent \$50 Local currency pay out = 2107.63 PHP.” The “Sender” is then identified to be “Carl Sara,” with an address of “[5555] RIGGS PLACE, NW,” “WASHINGTON, DC 20009” and an email address of “CARL_IN_DC@YAHOO.COM”.

52. I also reviewed an email, dated July 15, 2013, sent to “carl_in_dc” from one “mendozachristine023@yahoo.com”, with the subject “Fw: young naked pics”, in which “carl_in_dc” received several pictures of child pornography, some examples of which are:

- a. “(pthc lolifuck) 9 y o licking cock(2)(2).jpg” which depicts a young prepubescent girl licking an adult male penis; and
- b. “0001 (276).jpg” which depicts a very young prepubescent girl holding and licking an adult male penis.

53. I also reviewed a second email dated July 15, 2013, sent to “carl_in_dc” from “mendozachristine023@yahoo.com”, with the subject “Fw: new young pics”. This email contained several pictures of an adult male having sex with several prepubescent females. Some examples are:

- a. “7C2X2159.jpg”, which depicts an adult white male with his head covered by a t-shirt having sex with a prepubescent girl in front of several other prepubescent girls; and

- b. "img_2874.jpg", which depicts an adult white male having sex with a prepubescent female while his scrotum is inside of another prepubescent female's mouth.

54. I reviewed a third set of Yahoo! Messenger chat conversations in October 2013 between one "nicareyes_18" and the "carl_in_dc" account. In these chats, "nicareyes_18" claims to sell pictures and videos of her young girls, as well as to offer live webcam shows and in-person meetings with 12- and 13-year-old girls. In one chat, dated October 22, 2013, "nicareyes_18" discusses a "vacation with foreigner" with a 12- and 13-year-old. The user of "carl_in_dc" states, "I love young" and asks for details. He offers to meet in person when he travels in November of 2013. "[N]icareyes_18" describes various sexual activities, and "carl_in_dc" asks, "do you have pictures or videos of your date to share?" "[N]icareyes_18" offers to sell them to him.

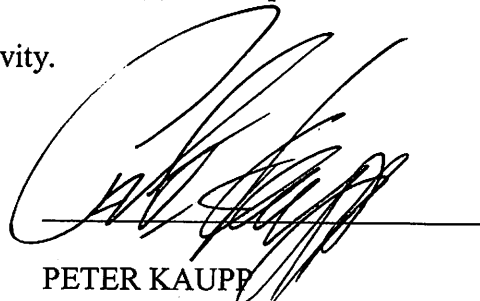
55. I reviewed a fourth series of Yahoo! Messenger chat conversations dated November 2013 to December 2013, between one "keme.dora28" and the "carl_in_dc" account. In these chats, "keme.dora28" offers to sell pictures and videos, do webcam shows, and arrange in-person meetings with young girls. In chats dated December 1, 2013, and December 2, 2013, "carl_in_dc" appears to discuss previously sent photos and request an in-person meeting with young virgins during an upcoming trip to the Philippines in January 2014 ("How much honey it cost to meet one of your young virgins in January?"). "Keme.dora82" states that the cost is \$100. The "carl_in_dc" user replies, "\$100 is good price for virgin honey." While discussing meeting with young girls, the "carl_in_dc" user says that the best "way to meet young girls is to date the moms, then they let you spend time with their daughters . . . My lover in Dasmarinas lets me sleep with her daughter,

very sexy.” Later in the chat, on December 3, 2013, “keme.dora28” provides the “carl_in_dc” user with login credentials to her dropbox.com account to download pictures of girls. He acknowledges “nice girls honey, the pics are still downloading.”

56. I reviewed a fifth set of Yahoo! Messenger chat conversations, dated December 2013 to August 2014, between Seller Account “estrellamanas@yahoo.com” (“estrellamanas”) and the “carl_in_dc” user which appear to discuss the sale of pictures and videos of young girls and the offering of live shows. In one Yahoo! Messenger chat conversation dated January 9, 2014, the “carl_in_dc” user states, “we should meet next time I am in the Philippines,” to which “estrellamanas” replies, “we already talked about that, we do meet my daughters . . . im willing to do all you wanted with my ynggirls friends . . . youngest 7 old can do suck cock eatcum” to which the “carl_in_dc” user replies, “wow that is exciting honey.” “Estrellamanas” requests that the “carl_in_dc” user send her \$30.


CONCLUSION

57. Based on the facts set forth herein, there is probable cause to believe that Carl Sara violated Title 18, United States Code, Section 2422(b), Attempted Coercion and Enticement of a Minor to Engage in Criminal Sexual Activity.



PETER KAUPP
SPECIAL AGENT
FEDERAL BUREAU OF INVESTIGATION

Subscribed to and sworn before me
This 18th day of February 2016.



/s/_____
Theresa Carroll Buchanan
United States Magistrate Judge
HONORABLE THERESA C. BUCHANAN
UNITED STATES MAGISTRATE JUDGE